

1 MONA Z. HANNA, ESQ. (SBN 131439)  
2 *mhanna@mrllp.com*  
3 SAMANTHA A. DRYSDALE, ESQ. (SBN 307233)  
4 *sdrysdale@mrllp.com*  
5 **MICHELMAN & ROBINSON, LLP**  
17901 Von Karman Avenue, Suite 1000  
Irvine, CA 92614  
Telephone: (714) 557-7990  
Facsimile: (714) 557-7991

6 Attorneys for  
7 STEVEN A. SUGARMAN

8 **UNITED STATES DISTRICT COURT**  
9 **CENTRAL DISTRICT OF CALIFORNIA**

10 In re BANC OF CALIFORNIA  
11 SECURITIES LITIGATION,

Case No.: 8:17-cv-00118-DMG (DFMx)  
CLASS ACTION

12  
13 This Document Relates To:,  
14 ALL ACTIONS.

**DECLARATION OF MONA Z. HANNA,  
ESQ. IN SUPPORT OF NON-PARTY  
MUDDY WATERS CAPITAL LLC'S  
APPLICATION FOR LEAVE TO FILE  
UNDER SEAL DOCUMENTS**

15  
16  
17 Date: December 1, 2023  
Time: 9:30 A.M.  
18 Judge: Hon. Dolly M. Gee  
Courtroom: 8C

**DECLARATION OF MONA Z. HANNA**

I, Mona Z. Hanna, declare as follows:

1. I am an attorney licensed to practice in the State of California and admitted to practice before this Court. I am a partner in Michelman & Robinson, LLP, counsel of record for STEVEN A. SUGARMAN (“Sugarman”) in this lawsuit. I have personal knowledge of the facts and circumstances declared herein, and I could and would testify competently to them if called upon to do so.

2. Pursuant to Civil Local Rule 79-5.2.2, Steven Sugarman does not oppose Muddy Waters Capital LLC (“Muddy Waters”) Application for Leave to File Under Seal Documents in Support of a Motion for Sanctions and Contempt Against Defendant Steve A. Sugarman and Latham & Watkins LLP (“Application”).

3. Steven Sugarman concurs with sealing Exhibit 2 to the Application (Exhibit D to the Declaration of Adam L. Levine) which is an email from defendant Steven Sugarman to the Anderson Kill firm and Adam Levine attaching the Expert Report (the “Transmittal Emails”). Good cause supports sealing this document as it is protected by attorney client privilege. *United States v. Sanmina Corporation*, 968 F.3d 1107, 1116 (9th Cir. 2020) (“The attorney-client privilege may extend to communications with third parties who have been engaged to assist the attorney in providing legal advice,” [ ] as well as to communications with third parties “acting as agent” of the client.”); *Guidiville Rancheria of California v. United States*, 2013 WL 6571945, at \*9 (N.D. Cal., Dec. 13, 2013, No. 12-CV-1326 YGR) (“The document is covered by the attorney-client privilege, which establishes compelling reasons for sealing it from the public record.”).

///

///

///

///

1 I declare under penalty and perjury under the laws of the United States of  
2 America that the foregoing is true and correct.

3 Executed on this 25th day of October 2023, in Irvine, California.  
4

5 /s/ Mona Z. Hanna  
6 Mona Z. Hanna  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27